

EXHIBIT 15

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SLY MAGAZINE, LLC,

Plaintiff,

-against-

WEIDER PUBLICATIONS L.L.C. AND
AMERICAN MEDIA, INC.

Defendants.

Civ. No. 05-3940 (RCC)

**DECLARATION OF SUSAN J.
KOHLMANN IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

I, SUSAN J. KOHLMANN, hereby declare as follows

1. I am a member of the Bar of this Court and a member of Pillsbury Winthrop Shaw Pittman LLP. I make this declaration in support of the Opposition of Defendants Weider Publications L.L.C. and American Media Inc. to Plaintiff's Motion for Preliminary Injunction, based on my personal knowledge and a review of publicly available documents.
2. Over a period of more than three decades, the actor Sylvester Stallone has starred or appeared in 52 films, has made more than 90 television guest appearances, including personal interviews on nearly every major news program. A true and correct copy of printouts from the Internet Movie Database (the "IMDB") website are attached hereto as Exhibit A.
3. A review of information publicly available on the internet shows that the name "Sly" has been developed to signify and promote a certain image in connection with Mr. Stallone's film work and in connection with his commitment to men's health and physical fitness. A successful actor and public figure since the 1970's, Mr. Stallone has been cultivating his image even further, focusing on fitness and lifestyle topics for men in a mature age bracket, writing articles and endorsing various health-related products. A true and correct copy of printouts from Mr. Stallone's fan website are attached hereto as Exhibit B.

4. Plaintiff SLY Magazine LLC maintains a website at www.slymagazine.com.
5. Although plaintiff purchased the website at www.slymagazine.com in or about June 2003, internet archive records demonstrate that the website did not show text or graphics until at least February 28, 2004. True and correct copies of printouts from the "Wayback Machine" internet archive database are attached hereto as Exhibit C.
6. As of December 17, 2005, plaintiff's internet magazine is titled "Sly...Shoes, The Obsession" in a stylized italicized script. A review of the internet pages displayed at Plaintiff's Website show advertisements and brief editorial pieces with leads such as "Diamonds are a girl's best friend and they're making a comeback" and "Bohemian chic dominated the runways at New York's fashion week. Here's a sneak peak of what to expect this fall..." as well as other items targeted to a New York City based female audience. A true and correct copy of printouts from the December 17, 2005 edition of plaintiff's website are attached hereto as Exhibit D.
7. Plaintiff has produced a document dated October 25, 2004, purporting to be an e-mail from a third party to plaintiff, informing plaintiff that "I am aware that Sylvester Stallone's magazine will be hitting the news stands sometime in January, 2005." A true and correct copy of this document is attached hereto as Exhibit E.

Date: December 20, 2005



SUSAN J. KOHLMANN